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Attorney for Plaintiff Amy Buchanan

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8  
9 AMY BUCHANAN,

CASE NO. 2:19-cv-00226-GMN-VCF

10 Plaintiff,

11 vs.

**STIPULATION AND ORDER TO  
EXTEND TIME FOR SUPPLEMENTAL  
BRIEFING ORDERED IN ECF No. 49**

12  
13 WATKINS & LETOFSKY, LLP, a Nevada  
14 Limited-Liability Partnership; DOES I-X;  
15 ROE BUSINESS ENTITIES I-X,

**(First Request)**

16 Defendants.  
17 .

18 The parties, by and through their respective counsel, hereby stipulate to extend the  
19 time for the parties to file the supplemental briefing ordered by the court in ECF No. 49  
20 regarding the number of employees at issue for Watkins & Letofsky if it is considered an  
21 integrated enterprise. The parties request an extension from the current due date of  
22 Monday, May 23, 2022 through and including **Friday, June 3, 2022**.

23 This is the first request for an extension of this deadline. The parties provide the  
24 following information to the Court regarding the proposed extension of time:

- 25  
26 1. Plaintiff's counsel has been extremely busy with other matters including a  
27 major brief due in a discovery dispute before Magistrate Judge Denney in

1 which he is required to respond to a 29 page brief filed after 5:00 p.m. on  
2 Friday May 20, but May 23, 2022, the same day as the court wanted the  
3 brief in this case.

- 4
- 5 2. Additionally Plaintiff's counsel is working on a Motion for Summary  
6 Judgment in a case in front of Judge Gordon that is due on May 25.
- 7 3. Additionally Plaintiff's counsel has three depositions and one private  
8 mediation this week which is taking a great deal of time to address.
- 9 4. Plaintiff's counsel needs an additional week to respond to the court in this  
10 matter and Defense counsel has agreed to this request.

11 This stipulation to extend the deadline is made in good faith and not for purposes of delay.

12 DATED this 23<sup>rd</sup> day of May, 2022.

13 KEMP & KEMP, ATTORNEYS AT LAW

14 By: /s/ James P. Kemp  
15 JAMES P. KEMP, ESQ.  
16 Nevada Bar No. 6375  
17 7435 W. Azure Drive, Suite 110  
18 Las Vegas, Nevada 89130  
19 *Attorneys for Plaintiff*

DATED this 23<sup>rd</sup> day of May, 2022.

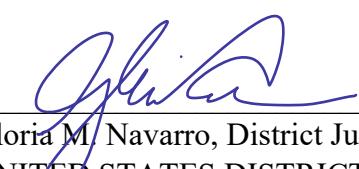
WATKINS & LETOFSKY

By: /s/Daniel R. Watkins  
DANIEL R. WATKINS, ESQ  
BRIAN LETOFSKY, ESQ  
WATKINS & LETOFSKY  
8935 S. Pecos, Suite 22A  
Henderson, NV 89074  
*Attorneys for Defendants*

21 **ORDER**

22 **IT IS SO ORDERED.**

23 Dated this 25 day of May, 2022.

24  
25   
26 Gloria M. Navarro, District Judge  
27 UNITED STATES DISTRICT COURT